



Anand Swaminathan <anand@loevy.com>

Rivera v. Guevera, et al. - Designation of Rule 30(b)(6) Witnesses

1 message

Steven Art <steve@loevy.com>

Sun, Aug 17, 2014 at 2:58 PM

To: "Catherine M. Barber" <cbarber@rockfuscoconnelly.com>

Cc: "loevylaw@loevy.com" <loevylaw@loevy.com>, "jon@loevy.com" <jon@loevy.com>, "elizabethm@loevy.com" <elizabethm@loevy.com>, "russell@loevy.com" <russell@loevy.com>, "mike@loevy.com" <mike@loevy.com>, "anand@loevy.com" <anand@loevy.com>, "Eileen E. Rosen" <ERosen@rockfuscoconnelly.com>, Jay Rock <JRock@rockfuscoconnelly.com>, Silvia Mercado <SMercado@rockfuscoconnelly.com>, "Stacy A. Benjamin" <SBenjamin@rockfuscoconnelly.com>, "s-tenenbaum@law.northwestern.edu" <s-tenenbaum@law.northwestern.edu>, "l-bowman@law.northwestern.edu" <l-bowman@law.northwestern.edu>, "a-vanbrunt@law.northwestern.edu" <a-vanbrunt@law.northwestern.edu>, Jeffrey Given <JGiven@jsotoslaw.com>, "Elizabeth A. Ekl" <eekl@jsotoslaw.com>, "Caroline P. Golden" <cgolden@jsotoslaw.com>, "Andrew J. Grill" <agrill@jsotoslaw.com>, Jim Sotos <jsotos@jsotoslaw.com>

Dear Counsel,

By close of business on August 22, 2014, please provide the City of Chicago's designation of witnesses for topics set out in Plaintiff's Rule 30(b)(6) notice of April 2, 2014, that were not addressed by your designation of Mr. Hickey. (I have attached the notice here again for your reference.) In addition, please provide dates on which those witnesses are available to sit for their depositions.

In the meantime, please do not hesitate to contact me with any questions that you may have. Thank you, as always, for your cooperation in this matter.

Sincerely,

Steve

On Mon, Apr 28, 2014 at 5:09 PM, Catherine M. Barber <cbarber@rockfuscoconnelly.com> wrote:

Dear Counsel

Please see the attached correspondence, document production (RFC 19354-19388), and Defendant City of Chicago's Response to Plaintiff's 10th Request to Produce Documents and 11th Request to Produce Documents. Hard copies will follow by U.S. Mail.

Thank you

Catherine M. Barber

Rock Fusco & Connelly, LLC

321 N. Clark St.

Suite 2200

Chicago, IL 60654

312-494-1000

cbarber@rockfuscoconnelly.com

—
Steven Art

LOEVY & LOEVY

312 N. May St., Suite 100

Chicago, Illinois 60607

Office Phone: (312) 243-5900

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**Hickey Exhibit 1.pdf**

198K



Anand Swaminathan <anand@loevy.com>

Re: Rivera v. Guevera, et al. - Designation of Rule 30(b)(6) Witnesses

1 message

Anand Swaminathan <anand@loevy.com>

Fri, Sep 26, 2014 at 1:33 PM

To: Steven Art <steve@loevy.com>

Cc: "Catherine M. Barber" <cbarber@rockfuscoconnelly.com>, "loevylaw@loevy.com" <loevylaw@loevy.com>, "jon@loevy.com" <jon@loevy.com>, "elizabethm@loevy.com" <elizabethm@loevy.com>, "russell@loevy.com" <russell@loevy.com>, "mike@loevy.com" <mike@loevy.com>, "Eileen E. Rosen" <ERosen@rockfuscoconnelly.com>, Jay Rock <JRock@rockfuscoconnelly.com>, Silvia Mercado <SMercado@rockfuscoconnelly.com>, "Stacy A. Benjamin" <SBenjamin@rockfuscoconnelly.com>, "s-tenenbaum@law.northwestern.edu" <s-tenenbaum@law.northwestern.edu>, "I-bowman@law.northwestern.edu" <I-bowman@law.northwestern.edu>, "a-vanbrunt@law.northwestern.edu" <a-vanbrunt@law.northwestern.edu>, Jeffrey Given <JGiven@jsotoslaw.com>, "Elizabeth A. Ekl" <eekl@jsotoslaw.com>, "Caroline P. Golden" <cgolden@jsotoslaw.com>, "Andrew J. Grill" <agrill@jsotoslaw.com>, Jim Sotos <jsotos@jsotoslaw.com>

Counsel, we still have not received the City's designation of witnesses for the remaining topics set out in Plaintiff's Rule 30(b)(6) notice, dated April 2, 2014. As you know, the City designated Mr. Hickey on topics 1(c), 1(d), 1(e) (excluding topics related to Gang Crimes), 1(f), 3 and 4(j). We have not received any other designations, which are long overdue. Please provide designations by October 3, along with dates on which the designated witnesses are available to sit for their depositions.

Thanks,
Anand

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Anand Swaminathan
Loevy & Loevy
312 N. May Street, Suite 100
Chicago, Illinois 60607
(312) 243-5900
anand@loevy.com

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Catherine M. Barber

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Anand Swaminathan <anand@loevy.com>

Rivera v. Guevara, et al. -- outstanding issues

1 message

Anand Swaminathan <anand@loevy.com>

Mon, Oct 20, 2014 at 9:29 AM

To: "Eileen E. Rosen" <ERosen@rockfuscoconnelly.com>, "Catherine M. Barber" <cbarber@rockfuscoconnelly.com>, Jay Rock <JRock@rockfuscoconnelly.com>, "Stacy A. Benjamin" <SBenjamin@rockfuscoconnelly.com>
Cc: "Jeffrey N. Given" <JGiven@jsotoslaw.com>, Jim Sotos <JSotos@jsotoslaw.com>, "Caroline P. Golden" <CGolden@jsotoslaw.com>, "Elizabeth A. Ekl" <EEkl@jsotoslaw.com>, Tonet Ballard <TBallard@jsotoslaw.com>, Locke E Bowman <l-bowman@law.northwestern.edu>, Steven Art <steve@loevy.com>, Jon Loevy <jon@loevy.com>, Russell Ainsworth <russell@loevy.com>, Heather Lewis Donnell <heather@loevy.com>, David M Shapiro <david.shapiro@law.northwestern.edu>, Alexa Anne Van Brunt <a-vanbrunt@law.northwestern.edu>, J Samuel Tenenbaum <s-tenenbaum@law.northwestern.edu>

Eileen,

We have not heard back from you on several items:

- 1) My September 26 email asking, again, for the City to complete its 30(b)(6) deposition designations.
- 2) My September 30 email asking for dates to perform the inspection discussed at the parties' September 23 court appearance.
- 3) My September 30 letter seeking supplemental responses to our discovery requests.

Please respond on these three issues by Friday, October 24. If we don't receive a response by then, we intend to file a motion to compel.

Finally, we are waiting to hear from you about when you would like to take Plaintiff's deposition. If you have dates in mind, please let us know.

Anand

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